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**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT**

**OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MINIDOKA**

|                                   |   |                                 |
|-----------------------------------|---|---------------------------------|
| STATE OF IDAHO, Department        | ) |                                 |
| of Finance,                       | ) |                                 |
|                                   | ) | Civil No. CV-97-00479*D         |
| Plaintiff,                        | ) |                                 |
|                                   | ) | <b>STIPULATION FOR JUDGMENT</b> |
| vs.                               | ) | <b>AND PERMANENT INJUNCTION</b> |
|                                   | ) |                                 |
| CAL-PRIDE OSTRICH FARMS, INC.,    | ) |                                 |
| STEVEN DI PRESSI, and BILL EVANS, | ) |                                 |
|                                   | ) |                                 |
| Defendants.                       | ) |                                 |
| _____                             | ) |                                 |

COMES NOW the Plaintiff, by and through counsel, and Defendants Cal-Pride Ostrich Farms, Inc., and Steven DiPressi (stipulating defendants), in order to avoid prolonged litigation, to stipulate and agree as follows:

1. The stipulating defendants enter their appearance in this action and submit

themselves to the jurisdiction of the above entitled Court.

2. The Plaintiff has authority to bring this action; this Court has jurisdiction over the subject matter of this action and over the parties hereto; and, the complaint on file herein states a cause of action for injunctive relief against the stipulating defendants.

3. The stipulating defendants neither admit nor deny that they violated the Idaho Securities Act as alleged in the complaint herein.

4. The stipulating defendants acknowledge and agree to comply with the Plaintiff's conclusion that the Cal-Pride Ostrich Farms partnership interests offered and sold in Idaho are securities.

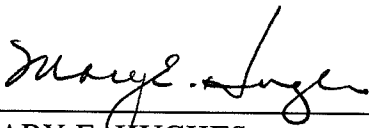
5. The stipulating defendants agree that they will cooperate with Plaintiff in further prosecution of this action against the remaining defendant, including testifying at trial.

6. The stipulating defendants agree that the Judgment and Permanent Injunction attached hereto may be entered against them and they hereby consent to the entry thereof.

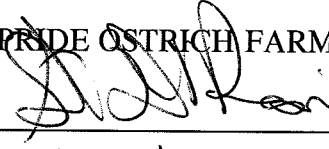
7. Said Judgment and Permanent Injunction shall constitute a final resolution of all issues presented in Plaintiff's complaint as to the Defendants Cal-Pride Ostrich Farms, Inc., and Steven DiPressi, and may be presented to the Court immediately or at any time convenient to the Court, without the necessity of findings of fact or conclusions of law or further pleadings or proceedings in this matter.

8. All stipulating parties shall bear their own attorney's fees and costs of litigation.

DONE this 30th <sup>April</sup> day of ~~March~~, 1998.

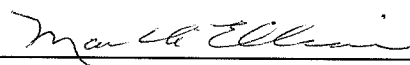
  
\_\_\_\_\_  
MARY E. HUGHES  
Deputy Attorney General  
Counsel for Plaintiff

CAL-PRIDE OSTRICH FARMS, INC.

By: \_\_\_\_\_

Title: PRES/CEO\_\_\_\_\_

  
\_\_\_\_\_  
STEVEN DI PRESSI

  
\_\_\_\_\_  
MARK A. ELLISON  
Counsel for Defendants  
Cal-Pride Ostrich Farms, Inc., and  
Steven DiPressi